

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

April 6, 2011

William A. Henry, Esq. Thomas Dillickrath, Esq. Baker Botts L.L.P. 1299 Pennsylvania Ave., NW Washington, DC 20004-2400

Re: Olin Corporation/BleachTech LLC, et al., FTC File No. 111-0042

Dear Mr. Henry and Mr. Dillickrath:

The Federal Trade Commission's Bureau of Competition has conducted a nonpublic investigation to determine whether Olin Corporation's proposed acquisition of BleachTech LLC, LDJ Petersburg LLC, and LDJ Peru LLC from Richard L. Immerman mayeAccordingly, the in

not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.